

SPANGENBERG
SHIBLEY & LIBER
TRIAL LAWYERS

— COMMITMENT INTEGRITY RESULTS —

PETER H. WEINBERGER, OF COUNSEL
WILLIAM HAWAL
PETER J. BRODHEAD, OF COUNSEL
DENNIS R. LANSLOWNE
STUART E. SCOTT
NICHOLAS A. DICELLO
JEREMY A. TOR, LICENSED IN NY, OH
DUSTIN B. HERMAN
MICHAEL P. LEWIS, LICENSED IN CA, OH
KEVIN C. HULICK
EMILY DAVIS

CRAIG SPANGENBERG
(1914-1998)

NORMAN W. SHIBLEY
(1921-1992)

JOHN D. LIBER
(1938-2013)

FILED

AUG 23 2021

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
AKRON

August 20, 2021

VIA FEDERAL EXPRESS OVERNIGHT DELIVERY

Attn: Clerk of Courts
United States District Court, Northern District of Ohio, Eastern Division
John F. Seiberling Federal Building & U.S. Courthouse
2 South Main Street
Akron, OH 44308

Re: *Raimey v. The City of Niles, et al.* | Case No. 4:20-cv-00005

Dear Clerk:

Enclosed please find a disc containing video footage (body worn camera footage) being submitted for manual filing in connection with the above-captioned case. Also enclosed is a copy of the corresponding *Plaintiff's Notice of Manual Filing of Exhibit 3 to Plaintiff's Memorandum in Opposition to Defendants' Motion for Summary Judgment* that has been filed with the Court on this date.

Very Truly Yours,



Nicholas A. DiCello
ndicello@spanglaw.com

NAD/kf

Enclosures

cc: (by U.S. Regular Mail): Gregory A. Beck, Esq.
Mel L. Lute, Jr., Esq.
Baker, Dublikar, Beck, Wiley & Mathews
400 South Main Street
North Canton, OH 44720

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

TIMOTHY A. RAIMEY, as administrator of the
Estate of MATTHEW BURROUGHS,

Plaintiff,

vs.

THE CITY OF NILES; et al.,

Defendants.

Case No. 4:20-cv-00005

JUDGE SARA LIOI

**NOTICE OF MANUAL FILING OF
EXHIBIT 3 TO PLAINTIFF'S
MEMORANDUM IN OPPOSITION
TO DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

Pursuant to § 16 of this Court's Electronic Filing Policies and Procedures Manual, Plaintiff hereby gives notice of the manual filing of **Exhibit 3** to his Memorandum of Law in Opposition to Defendants' Motion for Summary Judgment, to wit, a disc containing the video footage from the body camera worn by Defendant Officer Christopher Manella on January 2, 2019. The video footage disc has not been filed electronically because it cannot be reduced to a PDF format and exceeds the allowable size for electronic filings via the Court's CM/ECF system.

/s/ Nicholas A. DiCello

NICHOLAS A. DICELLO (0075745)

KEVIN C. HULICK (0093921)

SPANGENBERG SHIBLEY & LIBER LLP

1001 Lakeside Avenue East, Suite 1700

Cleveland, OH 44114

(216) 696-3232

(216) 696-3924 (FAX)

ndicello@spanglaw.com

khulick@spanglaw.com

Counsel for Plaintiff Timothy A. Raimey

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20th day of August 2021, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System. Copies will be served upon counsel of record and may be obtained through the Court's CM/ECF Systems. A true and correct copy of the foregoing Notice along with a copy of the disc referenced herein will also be served upon all counsel of record by U.S. mail.

/s/ Nicholas A. DiCello

NICHOLAS A. DICELLO (0075745)

KEVIN C. HULICK (0093921)

SPANGENBERG SHIBLEY & LIBER LLP

1001 Lakeside Avenue East, Suite 1700

Cleveland, OH 44114

(216) 696-3232

(216) 696-3924 (FAX)

ndicello@spanglaw.com

khulick@spanglaw.com

Counsel for Plaintiff Timothy A. Raimey